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Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

VALERY D. HUGINS,

Plaintiff,

v.

MARTIN O'MALLEY,  
Commissioner of Social Security,

Defendant.

Case No.: 2:24-cv-00734-MDC

**DEFENDANT'S UNOPPOSED MOTION  
FOR EXTENSION OF TIME  
(FIRST REQUEST)**

Defendant, the Commissioner of Social Security, respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Brief (Dkt. No. 16, filed on July 15, 2024), currently due on August 14, 2024, by 28 days, through and including September 11, 2024. Defendant further requests that all subsequent deadlines be extended accordingly.

This is Defendant's first request for an extension of time. Good cause exists for this extension because Defendant requires additional time for client communication. Upon review of the Plaintiff's opening brief and the record, the undersigned counsel for Defendant prepared a memorandum to the

1 client agency exploring settlement options. Additional time is needed to allow for a client agency  
2 response and to negotiate a possible settlement and, if necessary, submit a brief. This request is made  
3 in good faith and with no intention to unduly delay the proceedings. Defendant's counsel conferred  
4 with Plaintiff's counsel, who has no opposition to this motion.

5 It is therefore respectfully requested that Defendant be granted an extension of time to respond  
6 to Plaintiff's Brief through September 11, 2024.

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9 Dated: August 13, 2024

Respectfully submitted,

10 JASON M. FRIERSON  
United States Attorney

11 /s/ Michael J. Mullen  
12 MICHAEL J. MULLEN  
Special Assistant United States Attorney

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15 IT IS SO ORDERED:

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Hon. Maximiliano D. Couvillier III  
UNITED STATES MAGISTRATE JUDGE  
Dated: 8/14/24